

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a
PORNHUB.COM, MG FREESITES II
LTD., MINDGEEK S.A.R.L., MINDGEEK
USA, INC., MG BILLING LTD., and
HAMMY MEDIA LTD. d/b/a
XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD.,**

Defendants.

Case No.: 7:20-cv-00947-DCC

MOTION FOR EXTENSION OF TIME

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 6(b)(1)(A) and Rule 4(m) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the Plaintiffs may serve the Summons and Complaint on Defendants HAMMY MEDIA LTD., TRAFFICSTARS LTD., WISEBITS LTD, XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD..

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. The current deadline for service was September 1, 2022. On August 25, 2022, the Court held a status conference at which Plaintiffs were directed to file their motion for extension of time to serve the above defendants if necessary. At this time, there have been no requests to extend this deadline, nor has the Court granted any extension to this deadline. Plaintiffs respectfully request an additional six months to serve the Defendant

making the new deadline date March 1, 2023. This extension, if provided, would not interfere with any other deadlines set in this case. These Defendants are key parties to this matter. Plaintiffs seek this extension after having conferred with Defendants and not reaching an agreement regarding service. Plaintiff anticipates that service will be completed within the next six months.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose. Plaintiff attempted to confer with counsel for Defendants; however, Plaintiff did not receive consent regarding Defendants accepting service.

WHEREFORE, the Plaintiff, respectfully request this Court grant Plaintiffs Motion for Extension of time and enter an order extending the time in which service is due by an additional 180 days.

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WE SO MOVE:

BELL LEGAL GROUP, LLC

s/J. Edward Bell, III

J. Edward Bell, III (1280)

Joshua M. W. Salley (13214)

BELL LEGAL GROUP, LLC

219 North Ridge Street

Georgetown, SC 29440

TEL.: (843) 546-2408

FAX: (843) 546-9604

ebell@edbelllaw.com

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

Tyler S. Thompson (admitted Pro Hac Vice)

Liz J. Shepherd (admitted Pro Hac Vice)

Jordan A. Stanton (admitted Pro Hac Vice)

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

13800 Lake Point Circle

Louisville, KY 40223

Telephone: (502) 244-7772

tthompson@kytrial.com

lshepherd@kytrial.com

jstanton@kytrial.com

NATIONAL CENTER ON SEXUAL EXPLOITATION

Benjamin Bull (admitted Pro Hac Vice)

Danielle Bianculli Pinter (admitted Pro Hac Vice)

Christen Price (admitted Pro Hac Vice)

Peter Gentala (admitted Pro Hac Vice)

NATIONAL CENTER ON SEXUAL EXPLOITATION

1201 F Street NW

Washington, D.C. 20004

bbull@ncose.com

dpinter@ncoselaw.org

cprice@ncoselaw.org

pgentala@ncoselaw.org

ATTORNEYS FOR PLAINTIFF